

State of Louisiana

Lafourche Parish

**Declaration by Eric Callais Under Penalty of Perjury**

My name is Eric Callais. I am competent to make this declaration. I am the Corporate HSE Director for Grand Isle Shipyard, LLC. My address is 175 East 58th Street, Cut Off, Louisiana 70345-2922. My date of birth is January 30, 1969.

I have reviewed the allegations made by Mark Flora in Plaintiff's Original Petition filed on May 17, 2019 and assigned cause number 2019-34522; *Mark Flora v. Transocean Drilling (USA), Inc., et al.*; In the 234th Judicial District Court of Harris County, Texas.

The facts stated in this declaration are within my personal knowledge and are true and correct.

On May 24, 2017, Grand Isle Shipyard, LLC did not own, operate, or manage the vessel Maggie A. Grand Isle Shipyard, LLC still does not own, operate, or manage the vessel Maggie A.

On May 24, 2017, Mark Flora was not working for Grand Isle Shipyard, LLC.

On May 24, 2017, Grand Isle Shipyard, LLC was not responsible for maintaining, inspecting, repairing, or operating the vessel Maggie A.

On May 24, 2017, Grand Isle Shipyard, LLC was not responsible for providing medical treatment or safety equipment for the vessel Maggie A.

On May 24, 2017, Grand Isle Shipyard, LLC was not responsible for training employees, supervising crew, providing crew, supervising jobs, or performing jobs aboard the vessel the Maggie A.

On May 24, 2017, Grand Isle Shipyard, LLC did not employ the crew of the vessel Maggie A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 27, 2019.



Eric Callais

**EXHIBIT**